

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare and state that:

1. I have today been advised by Richard Wynne, attorney for Joseph Yanny, that the Scientology organization plaintiffs in the case of Religious Technology Center v. Yanny, Los Angeles Superior Court No. BC 033035, have filed a motion in that case for an order compelling my answer to certain questions apparently unanswered at my deposition in this case on October 11, 1991.

2. I have not received nor seen a copy of the deposition transcript, and I have not been served with nor have I seen the organization's motion to compel.

3. Mr. Wynne informed me that there are two main areas in which the organization seeks to compel my answers to its questions: conversations between Joseph Yanny and me which are privileged in accordance with our holy relationship; and, The Gerald Armstrong Corporation.

4. I founded a church in 1986 which has many members internationally. The church has a belief, a corollary thereto, and the obvious. The belief is that when members of the church are together God is present. The corollary thereto is that whatever is done or said when members of the church are together is sacred. The obvious is that it has ever been and will always be so. Mr. Yanny is a member of my church. Unless he specifically advises me that he waives the clergyman-penitent (or in our church the holy relationship) privilege I will consider our conversations sacred and will not disclose their content. I have a personal hierarchy of

conditions which temper that privilege: it does not apply where safety, courtesy or wisdom require otherwise. These conditions, however, are not present in this matter at this time, thus the privilege applies completely.

5. I formed The Gerald Armstrong Corporation (TGAC) in 1987. It possesses my original art works, writings and holds various rights to various of my discoveries and products. Its purpose is to be a vehicle for peace. It has no legal relationship to the Scientology organization. Mr. Yanny became a shareholder in TGAC in 1991. Although we were brought together in 1990 through our involvement in organization-related litigation, Mr. Yanny purchased stock because he believes, I believe, in its value and in TGAC's purpose and projects. He is not involved in any way with TGAC's operations, which are unrelated to this litigation and not relevant for further deposition inquiry.

6. The Scientology organization bases this litigation as it relates to me on the allegation that Joseph Yanny has represented me in organization-related litigation. I have stated it many times, but will do so again here to make it extremely clear that he has not represented me or provided me with any help in my litigation or any information to assist me in my litigation with the organization. I have not sought his help and he has not offered to either help or represent me in organization-related litigation.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 14th day of November, 1991 at San Anselmo,

California.

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Gerald Armstrong